

# EXHIBIT A

# ABRAMS AF FENSTERMAN

Abrams, Fensterman, Fensterman, Eisman, Formato, Ferrara, Wolf & Carone, LLP

Attorneys at Law

[www.abramslaw.com](http://www.abramslaw.com)

160 Linden Oaks  
Rochester, New York 14625  
Phone: 585-218-9999  
Fax: 585-218-0562  
FAX NOT FOR LEGAL SERVICE

**FIRM OFFICES**

Brooklyn  
Lake Success  
New York

October 30, 2020

**VIA: FIRST CLASS MAIL**

TO: Jeffrey L. Calabrese, Esq.  
Harter Secrest & Emery LLP  
1600 Bausch and Lomb Place  
Rochester, New York 14604

Steven E. Cole, Esq.  
Adams LeClair LLP  
28 E. Main Street, Suite 1500  
Rochester, New York 14614

Re: Michael Donoghue and Premium Mortgage Corp. v. Cynthia Nostro, Dylan Randall, David Popham and Everett Financial, Inc. d/b/a Supreme Lending  
Case No.: 6:20-CV-06100-EAW

Dear Counsel:

I am going to be handling this matter with Sharon Stiller in connection with the above captioned matter. Preliminarily and with respect to the mandatory FRCP 26 initial conference, I understand that the parties have already conferred on discovery issues in connection with the prior mediation. I note, however, that the initial disclosures have not been exchanged. To that end, we request the scheduling of a more formal initial conference between all counsel. Please let me know of your availability during the week of November 9<sup>th</sup> and we will make the arrangements.

Additionally, and enclosed for service, please find:

- (1) Plaintiffs' Initial Rule 26 Disclosures;
- (2) Plaintiffs' First Set of Interrogatories to Everett Financial, Inc.;
- (3) Plaintiffs' First Set of Interrogatories to Cynthia Nostro;

- (4) Plaintiffs' First Set of Interrogatories to Dylan Randall;
- (5) Plaintiffs' First Set of Interrogatories to David Popham;
- (6) Plaintiffs' First Request for Production of Documents to Everett Financial, Inc.;
- (7) Plaintiffs' First Request for Production of Documents to Cynthia Nostro;
- (8) Plaintiffs' First Request for Production of Documents to Dylan Randall;
- (9) Plaintiffs' First Request for Production of Documents to David Popham;
- (10) Plaintiffs' Notice of Deposition to Everett Financial, Inc.;
- (11) Plaintiffs' Notice of Deposition to Cynthia Nostro;
- (12) Plaintiffs' Notice of Deposition to Dylan Randall; and
- (13) Plaintiffs' Notice of Deposition to David Popham.

We look forward to learning of your availability for the conference. Please email or call me should there be any matters you would like to discuss. Thank you.

Very truly yours,



Maureen T. Bass

MTB/smm  
Enclosures